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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

RICHARD KADREY, et al.,

Individual and Representative Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 3:23-cv-03417-VC

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED RE: ADDITIONAL
DISCOVERY PROPOSAL**

Pursuant to Civil Local Rules 7-11, 79-5(f), and this Court’s Standing Order on Motions to Seal, Plaintiffs respectfully submit this Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed, filed in connection with Plaintiffs’ Additional Discovery Proposal. The letter and accompanying exhibits contain material that Defendant Meta Platforms, Inc. (“Meta”), has designated as “Highly Confidential - Attorneys Eyes Only,” as defined in the in the parties’ Stipulated Protective Order for Litigation Involving Patents, Highly Sensitive Confidential Information and/or Trade Secrets (ECF No. 90, the “Protective Order”):

Document	Portions to be Filed Under Seal	Basis for Sealing Portion of Document
Letter re Additional Discovery Proposal	Highlighted Portions	Refers to material designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit A	Full Document	Refers to material designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit C	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”

Plaintiffs provisionally file the above-referenced documents under seal subject to Meta’s forthcoming sealing motion.

Dated: March 5, 2025

By: /s/ Maxwell V. Pritt
Maxwell V. Pritt

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